Mr. Scott Rice United States Environmental Protection Agency Waste and Chemicals Division 1060 Chapline Street Suite 303 Wheeling, WV 26003-2995 KEATING ENVIRONMENTAL MANAGEMENT, INC.

835 Springdale Drive Suite 200 Exton, PA 19341

610.594.2600 P 610.594.6100 F

keatingenvironmental.com

KEM

KEATING ENVIRONMENTAL MANAGEMENT

Environmental, Energy & Sustainability Solutions Transformer Compliance Project George Washington High School

School District of Philadelphia

Transformer Replacement - Substation No. 2

Dear Scott:

Re:

I hope that this letter finds you well and enjoying what remains of the summer!

Please accept this letter as a *formal* report regarding the removal of the PCB Transformer (Allis Chalmers, serial number 3338913) from Substation No. 2 at the George Washington High School.

The transformer was removed on July 13, 2012 without incident. The removal actions were completed in accordance with the contractor provided/School District reviewed Work Plan. The enclosed letter of July 31, 2012 from Keating Environmental to the School District of Philadelphia (1) describes the work that was performed and (2) provides the transportation manifests for the transformer, the PCB oil and debris.

Please contact me if you have any questions regarding the enclosed report. In addition, while you will receive a separate report, please be advised that the PCB Transformer from Substation No. 1 (Serial No. 3338914) was removed on Saturday, August 25, 2012, also without incident, in accordance with the Work Plan. Therefore, there are no longer any PCB transformers at the George Washington High School.

Regards,

KEATING ENVIRONMENTAL MANAGEMENT, INC.

Keith Choper, P.E., LEED-AP

Enclosure: July 31, 2012 Letter from Keating Environmental to the School

District of Philadelphia re: PCB Transformer Removal

cc: Ms. Francine Locke

Mr. Jerry F. Junod Project File 5385 A WBE Certified Corporation





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July 31, 2012 (file: 5385)

RE:

Ms. Francine Locke, Director Office of Environmental Management and Services School District of Philadelphia 440 North Broad Street, 3<sup>rd</sup> Floor Philadelphia, PA 19130

**PCB Transformer Removal** 

10175 Bustleton Avenue

George Washington High School

Exton, PA 19341 610.594.2600 P 610.594.6100 F

**KEATING** 

Suite 200

ENVIRONMENTAL MANAGEMENT, INC.

835 Springdale Drive

keatingenvironmental.com



KEATING ENVIRONMENTAL MANAGEMENT

Environmental, Energy & Sustainability Solutions

## Philadelphia, Pennsylvania

This letter documents the decommissioning and disposal of the PCB transformer from Substation 2 at the George Washington High School. The remaining PCB transformer is scheduled to be removed in conjunction with the ongoing school renovation project during August 2012.

## Background

Dear Francine:

George Washington High School has been operating two PCB transformers under a Consent Decree with the United States Environmental Protection Agency (USEPA) since March 1997. These transformers were located in separate substations on the ground floor of the facility. Both units were manufactured by Allis Chambers and contained 4,445 pounds (approximately 350 gallons) of Chlorextol dielectric fluid. The individual transformers, identified by serial number and location are summarized below.

PCB Transformer Summary							
George Washington High School							
Transformer	Serial Number	Location					
Transformer 1	3338914	Substation 1					
Transformer 2	3338913	Substation 2					

## **Transformer Removal**

The transformer decommissioning was conducted in conjunction with a school renovation project that included the installation of two new, non-PCB transformers. In preparation for the renovation project, a technical specification was prepared by KEM describing the

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Ms. Francine Locke School District of Philadelphia July 31, 2012 Page 2 of 5

environmental requirements necessary for the removal and disposal of the transformers in accordance with the Consent Decree and applicable state and federal regulations.

The electrical construction contract for the George Washington High School renovation was awarded to C.A.D. Electric, Inc. (C.A.D.) located in Rose Valley, Pennsylvania. The removal and disposal of the PCB transformer equipment and dielectric fluid was subcontracted by C.A.D. to Ferrick Construction Company, Inc. (Ferrick), a Philadelphia-based environmental construction services company. Transportation and disposal services were provided by Clean Harbors Environmental Services (Clean Harbors) of Philadelphia.

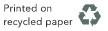
In accordance with the technical specification, Ferrick prepared a Work Plan and schedule for the work associated with the removal of the PCB transformers. A project meeting was held to address elements of the Work Plan that did not comply with the requirements of the specification. Following revisions by Ferrick, the Work Plan was accepted by the School District project team. In preparation for the removal of the PCB transformer from substation 2, C.A.D. removed all switch gear and other electrical components except overhead wire from the substation prior to initiating decommissioning activities.

On July 13, 2012, KEM observed the decommissioning and removal of the PCB transformer from substation #2. Decommissioning activities included transferring the dielectric fluid into 55-gallon drums and removing the fluid and transformer carcass from the substation. The PCB oil was drained from the transformer using a pneumatic diaphragm pump instead of a vacuum truck as described in the Work Plan.

The following activities were completed during the transformer decommissioning:

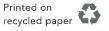
- Stains on the substation floor, in the adjacent light well and work area outside the building were identified and marked as existing before the Work was initiated.
- Floor drains in the substation and light well outside the substation were plugged, covered with oil-absorbent spill pads and/or surrounded by spill booms.
- Plastic sheeting was used to cover the substation floor around the transformer and the drum staging area in the adjacent light well.





- Seven DOT-approved 55-gallon steel drums were staged on plastic in the light well. One drum was staged inside the substation for waste.
- A pneumatic diaphragm pump and hose sections were placed on the plastic sheeting between the transformer and drums in the light well. All connections were made using cam and groove couplings. Spill pads were placed beneath the pump and each hose connection.
- A threaded vent plug was removed from the top of the transformer.
- A coupling adapter was installed on the gate valve transformer drain. Spill pads were placed below the adapter and the drain hose was attached with a cam and groove coupling. A ball valve nozzle was installed on the discharge end of the hose.
- Compressed air was supplied to the pump. One worker operated the gate valve on the transformer drain while a second worker used the discharge nozzle to fill the drums.
- The oil flow was halted when each drum was approximately 90% full. A spill pad was used to catch any drips from the nozzle while changing drums.
- The spill pads beneath the transformer drain, pump and hose connections were continuously monitored for leaks during the PCB oil transfer process.
- Once the transformer was drained, the gate valve was closed, the hose was disconnected and placed into a 5gallon container of diesel fuel. The diesel fuel was used to flush the pump and hose assembly before being discharged into a 55-gallon drum. A total of seven drums containing dielectric PCB oil and diesel fuel were generated.
- As the drums were filled, the bung holes of each drum were sealed with threaded plugs.
- Spill pads were used to contain any drips as the hose sections were disconnected and removed from the pump.
   Caps were used to seal the pump openings. The groove



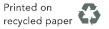


Ms. Francine Locke School District of Philadelphia July 31, 2012 Page 4 of 5

end of each hose section was inserted into the cam end and locked.

- The drums of oil were lifted out of the light well using a
  forklift equipped with chains and a drum clamp. Once
  all drums were removed from the light well, the fork lift
  was used to place them on a flatbed trailer. The trailer
  was equipped with a welded steel pan that provided
  secondary containment.
- The expansion chamber was removed from the top of the transformer carcass to accommodate the door opening into the light well.
- The plastic sheeting and spill pads were collected and placed into the waste drum.
- The carcass was raised with jacks and tripod casters were placed under each corner.
- The carcass was moved to the doorway leading into the light well. The forklift and chains was used to lift the carcass over the threshold and into the light well. The carcass was hoisted out of the light well and placed onto the flatbed trailer. The expansion chamber was removed from the substation and placed on the flatbed trailer.
- The drums and carcass were labeled as PCB and manifested under a uniform hazardous waste manifest for transport to a Clean Harbors facility in Twinsburg, Ohio. According to the Ferrick Waste Management Plan, the dielectric fluid will be transported to a Clean Harbor incinerator in Deer Park Texas and the carcass will be cleaned and dismantled at a Clean Harbor facility in Coffeyville, Kansas.
- The transformer carcass and seven drums of PCB oil were transported from the site on July 13, 2012. A copy of the transportation manifest showing acceptance at the Twinsburg facility is attached. According to Clean Harbors personnel, the oil and carcass will be manifested as Clean Harbors waste when shipped to their other facilities. The School District will receive certificates of destruction once the material has been processed.





Ms. Francine Locke School District of Philadelphia July 31, 2012 Page 5 of 5

> • The substation was broom swept and all collected debris placed into the PCB waste drum. The substation, light well and outside work areas were surveyed to confirm no new stains were present. Drain protections were removed. The waste drum was labeled and left on site until the removal of the other transformer is complete.

The removal of the transformer from substation 2 did not damage the encapuslated area and no evidence of additional staining was observed on the floor slab beneath the transformer. The approved renovation plan includes the installation of a 4-inch concrete pad on top of the majority of the existing floor slab. No drilling, coring or abrading of the encapsulated area was permitted during the installation of the new floor slab. Because PCB-impacted concrete remains at the school, the requirements of the Consent Decree regarding to the maintenance and documentation of the encapsulated area will remain in effect until such time as the affected area is removed as described in the Consent Decree and Cleanup Plan.

KEM appreciate the opportunity to be of continued service to the School District of Philadelphia. Please contact me if you have any questions or comments.

Regards

KEATING ENVIRONMENTAL MANAGEMENT, INC.

J. Stuart Wiswall, PG, LEED-AP

Senior Project Manager

Attachments: Hazardous Waste Manifest

Cc: Mr. Jerry Junod

File 5385



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## PCB CONTINUATION SHEET

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